

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
JAMES A. REYNOLDS	:	CASE NO. 1-18-01044-HWV
TIFFANY M. REYNOLDS	:	
Debtors	:	CHAPTER 13
	:	
MILL CITY MORTGAGE LOAN	:	
TRUST 2016-1, WILMINGTON	:	
SAVINGS FUND SOCIETY, FSB,	:	
D/B/A CHRISTIANA TRUST AS	:	
TRUSTEE	:	
Movant	:	
	:	
v.	:	
	:	
JAMES A. REYNOLDS	:	
TIFFANY M. REYNOLDS	:	
Respondents	:	

DEBTORS' RESPONSE TO MOTION OF
MITT CITY MORTGAGE LOAN TRUST 2016-1, WILMINGTON
SAVINGS FUND SOCIETY, FSB, D/B/A CHRISTIANA TRUST AS TRUSTEE
FOR RELIEF FROM THE AUTOMATIC STAY
RE: 4996 STATE HWY 42, UNITYVILLE, PA 17774

AND NOW, come Debtors, James A. Reynolds and Tiffany M. Reynolds, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted.
2. Admitted in part and denied in part. The Promissory Note speaks for itself. Strict proof is demanded.
3. Admitted in part and denied in part. The Mortgage speaks for itself. Strict proof is demanded.
4. Admitted in part and denied in part. Debtors have no knowledge of the assignment. Strict proof is demanded.

5. Admitted in part and denied in part. Debtors have no knowledge of the assignment.

Strict proof is demanded.

6. Admitted in part and denied in part. Debtors have no knowledge of the assignment.

Strict proof is demanded.

7. Admitted in part and denied in part. Debtors have no knowledge of the assignment.

Strict proof is demanded.

8. Admitted in part and denied in part. Debtors have no knowledge of the assignment.

Strict proof is demanded.

9. Admitted in part and denied in part. Debtors have no knowledge as to who the current mortgagee is. Strict proof is demanded.

10. Admitted.

11. Denied. The Debtors list the current value of the property at \$103,908.00.

12. Admitted in part and denied in part. Debtors admit that they were behind on payments pre-petition. Debtors deny that the pre-petition arrearage was \$5,477.62. Debtors submit that the pre-petition arrearage was much less than said amount.

13. Admitted in part and denied in part. The current mortgage payment is much less than that stated by the Movant. Movant incorrectly believes that there is an escrow for taxes and insurance. There has never been an escrow for taxes and insurance. Debtors have consistently paid the taxes and insurance themselves directly and not through the mortgage company since the loan was originated.

14. Admitted in part and denied in part. Debtors have no knowledge. Strict proof is demanded.

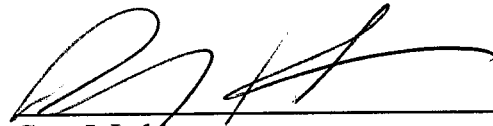
15. Admitted.

16. Denied. Debtors believe that they are current on the post-petition payments. Strict proof is demanded.

17. Denied. See response to paragraph 16.

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum
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Attorney for Debtors

DATED: _____

8/30/19

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF MILL CITY MORTGAGE LOAN TRUST 2016-1, WILMINGTON SAVINGS FUND SOCIETY, FSB, D/B/A CHRISTIANA TRUST AS TRUSTEE, FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J. DEHART III, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

dehartstaff@pamd13trustee.com

MICHAEL J. SHAVEL, ESQUIRE
HILL ALLACK, LLP
COUNSEL FOR MOVANT
VIA E-SERVICE

mshavel@hillwallack.com

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For Debtors

DATED: 8/30/19